

Framework

Bendigo Super Conflicts Management Framework

Group Regulatory Compliance

Version 1

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OVERVIEW

BACKGROUND

Bendigo Superannuation Pty Ltd ABN 23 644 620 128 (Bendigo Super) is the trustee and registrable superannuation entity (RSE) licensee of The Bendigo Superannuation Plan (the RSE). It is a subsidiary of Bendigo and Adelaide Bank Limited (the Bank) and is part of the Bendigo and Adelaide Bank Group (the Group) which comprises the Bank and its controlled entities.

The RSE has the following product offers:

- Bendigo SmartStart Super, including Bendigo MySuper as its default investment option (BSSS); and
- Bendigo SmartStart Pension (BSSP).

Bendigo Super also issues the Bendigo Superannuation Contribution Service (non-cash payment product), which is a clearing house service offered to its employer-sponsor groups. This product is closed to new employer groups.

The Bendigo Super Board is ultimately responsible for ensuring it has an adequate conflicts management framework that complies with its legal obligations; however it can make use of Group policies which give appropriate regard to Bendigo Super's activities and specific requirements.

PURPOSE

The Bendigo Super Conflicts Management Framework (CMF) outlines Bendigo Super's approach to the management of conflicts of interest. The CMF's objective is to ensure Bendigo Super identifies and avoids, or prudently manages all perceived, potential and actual conflicts of interest that arise in its business operations.

The CMF outlines the Group policies approved and used by Bendigo Super to govern its management of conflicts of interest and guides applicable staff and responsible persons on the application of those policies as they relate to Bendigo Super's operations.

The fundamental principle of the framework is to ensure that the best financial interests of RSE beneficiaries are prioritised and met despite a conflict arising.

The framework is designed to meet the prescribed APRA and ASIC conflict management requirements (refer to section 5. *Relevant Legislation*).

APPLICATION

This framework applies to Bendigo Super.

INTERPRETATIONS/DEFINITIONS

For the purposes of this framework, following terms have the meanings described below.

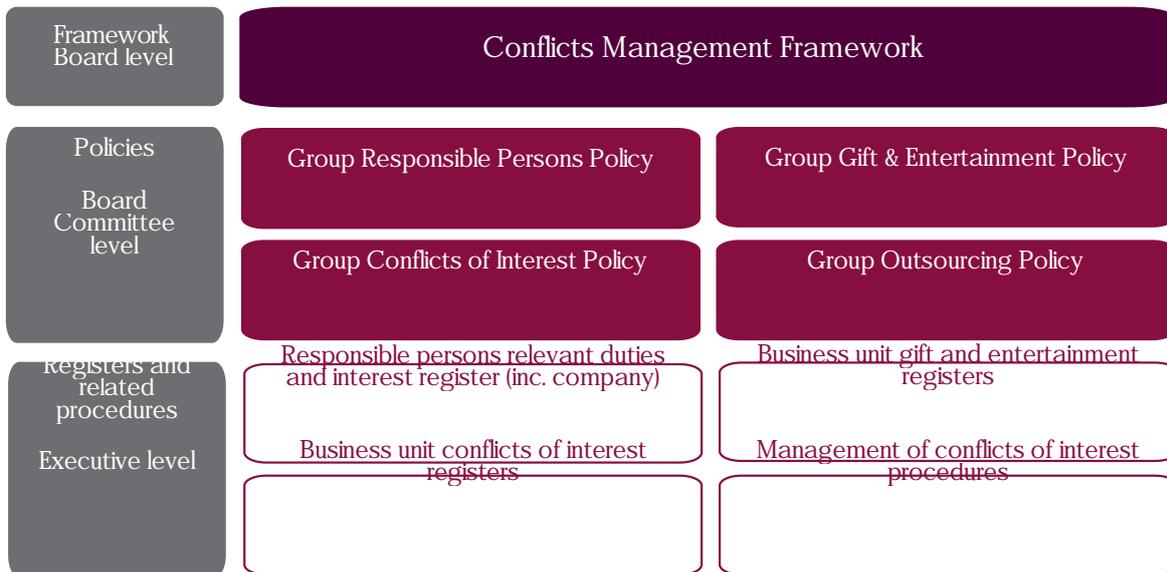
Term	Description
Beneficiaries	A reference to beneficiaries is a reference to the beneficiaries of the RSE, which are the members of the RSE and/or beneficiaries of the RSE members.
Staff	Refers to Bank staff who are responsible for performing Bendigo Super functions.
Board	Refers to the Bendigo Super board of directors.
Responsible person	<p>A reference to responsible person refers to persons appointed to a 'responsible persons position' as determined by Bendigo Super in accordance with its Responsible Persons Policy. Responsible persons positions include:</p> <ul style="list-style-type: none"> • Bendigo Super directors • Bendigo Super company secretary(ies) • Bendigo Super executive officer(s) • Certain senior manager positions • RSE auditor(s) and • Any other position determined to be a responsible persons' position by the Board or by APRA.
Relevant duty	A relevant duty refers to any duty owed by Bendigo Super, or a responsible person of Bendigo Super, to beneficiaries or to any other person;
Relevant interest	A relevant interest of Bendigo Super, an associate of Bendigo Super or a responsible person of Bendigo Super refers to any interest, gift, emolument or benefit, whether pecuniary or non-pecuniary, directly or indirectly held by Bendigo Super, the associate or the responsible person that Bendigo Super has determined to be relevant
Conflict	<p>A reference to a 'conflict' is a conflict:</p> <ul style="list-style-type: none"> • between the duties owed by Bendigo Super, or a responsible person of Bendigo Super to beneficiaries and the duties owed by them to any other person; • between the interests of beneficiaries and the duties owed by Bendigo Super or a responsible person of Bendigo Super, to any other person;

Term	Description
	<ul style="list-style-type: none"> • between an interest of Bendigo Super, an associate of Bendigo Super or a responsible person or an employee of Bendigo Super, and Bendigo Super’s duties to beneficiaries; and • between an interest of Bendigo Super, an associate of Bendigo Super, or a responsible person or an employee of Bendigo Super, and the interests of beneficiaries. <p>Perceived, actual, and potential conflicts are contemplated and managed.</p>

SCOPE

The CMF outlines the roles, responsibilities and resources for the oversight of conflicts management across Bendigo Super’s operations. It describes the linkages between this document, applicable Group policies, registers and procedures (refer to Diagram 1).

Diagram 1: Conflict Management Framework document architecture¹



¹ Conflicts management obligations are also included in related documents, in accordance with the requirements set out in the CMF. Refer to the *Related Documents Table* in the Governance section of this document.

FRAMEWORK

1 CONFLICTS OF INTEREST WORKFLOW

The CMF provides a holistic approach to the management of conflicts across Bendigo Super's operations to ensure RSE beneficiaries' best financial interests are prioritised, and decisions are not conflicted. Bendigo Super adopts the below workflow to manage perceived, potential and actual conflicts across its operations.

All perceived, potential or actual conflicts that are identified will be managed in accordance with this process and the applicable Group policy.



Bendigo Super is a member of a consolidated Group of companies and under its operation model it shares resources with its parent entity and other controlled entities across the Group. This model can give rise to perceived, potential or actual conflicts of interest. Whilst the Group and its members are committed to *'Feed into the prosperity of our customers and their community, not off it...'*, it is acknowledged that the performance of the following types of activities may give rise to a potential conflict of interest.

Table 1: Types of activities that may give rise to conflicts of interest

Activity	Role	Duties owed to
Superannuation operations, including: <ul style="list-style-type: none"> investment activities product design product distribution appointment of service providers and appointment of external experts and advisers (including auditors). 	RSE licensee (trustee)	Beneficiaries
Corporate entity including: <ul style="list-style-type: none"> capital and cash flow management and shareholder interests. 	Subsidiary company	Shareholders (the Bank)

1.1 Identification Interests and Duties

The identification of relevant interests and duties provides a means to identify perceived, potential and actual conflicts. Bendigo Super undertakes a regular structured approach to identify interests and duties that may result in a conflict of interest.

Bendigo Super responsible persons, staff and related stakeholders have an obligation to report potentially relevant material interests and duties.

Table 2: Standard identification processes by role

Position	Standard identification process
Responsible Persons (excluding RSE Auditor(s))	<p>Prior to appointment, Responsible Persons are required to disclose potential material personal interests and duties and/or potential conflicts of interest to People and Culture for consideration and recording. On appointment they are also instructed to promptly report any changes to the above items in accordance with the Group's Responsible Persons Policy.</p> <p>At the commencement of each Board or Board Committee meeting all responsible persons in attendance must declare whether they have any conflicts of interest.</p> <p>In addition, on an annual basis Responsible Persons are required to confirm (or update) their disclosed record of material interests and duties.</p>
Staff	<p>When position descriptions are developed and updated, they are reviewed to ensure roles and responsibilities will not create a conflict of interest. Prior to appointment, staff will be required to disclose potential material personal interests and duties for consideration and recording. On appointment they are also instructed to promptly report any changes to the above items in accordance with the Group's Conflict of Interest Policy.</p> <p>Applicable staff receive monthly reminders to identify and report potential material personal interests and duties, and applicable gifts and entertainment offered and received, that could give rise to a conflict of interest, to their Executive Member's Assistant.</p>
Material service providers	<p>Review and appointment of material service providers are governed by the Group Outsourcing Policy. Prior to appointment and or reappointment of a service provider due diligence is required to be conducted. It must be determined that the service provider can conduct itself in the best financial interests of beneficiaries. In order to make this determination reasonable enquiries are made to ensure that the service provider's interests will not prohibit it from being able to perform the appointed functions.</p>
RSE Auditor(s)	<p>Prior to appointing and audit engagement, the RSE Auditor is required to disclose any potential conflicts of interest (including perceived conflicts) and make declarations of independence.</p>

In addition, the following activities may identify undisclosed or unidentified conflicts of interest.

Table 3: Identification processes by activity

Activity	Process
Risk and Control Self-Assessment (RCSA)	Annual or change RCSA workshops, held with management and/or the Board, may identify new, undisclosed or unidentified conflicts of interest.
Quarterly review of the Gift and Entertainment Register	Bendigo Super's Gift and Entertainment Register is reviewed on a quarterly basis to identify any gifts offered/recorded that may be a conflict of interest.
Event management	Risk events may identify non-compliance with this framework and relevant legislation.
Whistleblowing	The Whistleblower reporting program (including internal processes and an external whistleblowing protection service) may detect misconduct or other improper practices that may have had an adverse impact on beneficiaries due to a conflict.
Audit programs	Internal and external audit work may identify non-compliance with, or ineffective controls, in respect to identification of conflicts of interests.
Head of Office of the Superannuation Trustee (HOST)	The oversight and review program of the HOST (including independent analysis and expert advice) may identify perceived, potential or actual conflicts of interest not disclosed (intentional or unintentional).

1.2 Assessment for Relevance

All duties and material personal interests identified must be assessed for relevance. To be assessed as relevant, the interest or duty must have the potential to have a significant impact on Bendigo Super's capacity to act in a manner that is consistent with the best financial interests of beneficiaries.

In accordance with Bendigo Super's organisational structure, only certain positions can influence and make decisions that could have a significant impact on the best financial interests of beneficiaries. These include all responsible person positions and certain roles in the investment team.

It is also considered that material service provider engagements have the potential to have a significant impact on the best financial interests of beneficiaries.

The assessment process for these positions are set out in the table below.

Table 4: Assessment processes by Position

Position	Relevance assessment
Responsible Persons (excluding RSE Auditor(s))	Identified interests and will only be deemed 'relevant', if they are reasonably considered to have the potential to influence the responsible person's vote and/or decision in respect of

Position	Relevance assessment
	<p>beneficiaries' interests. It is the responsibility of each responsible person to determine their material personal interests. This determination should be based on the responsible person's own personal circumstances.</p> <p>In applying the relevance tests identified above, the following factors will be considered:</p> <ul style="list-style-type: none"> the dollar value of the conflict (if able to be quantified) and the nature of the duty or interest, including whether it is a one-off occurrence or whether it has an ongoing, recurring, or cumulative nature. <p>This assessment is facilitated by People & Culture and endorsed by the particular responsible person</p>
RSE Auditor(s)	<p>RSE Auditor is assessed against applicable regulatory criteria in respect of eligibility, independence, fitness and propriety, potential conflicts (including perceived conflicts) and audit rotation requirements.</p> <p>In addition, a responsible person assessment must be completed for the RSE auditor. This includes a confirmation from the lead auditor that he or she meets the additional specific requirements prescribed by APRA.</p>
Staff in investment positions	<p>Each Group Executive Member's Assistant processes received conflicts of interest reports and ensures the required assessment is performed (by the applicable line manager or suitably independent person). The assessment must consider if beneficiaries' financial interests could be adversely impacted due to the staff members own interests or duties. For Bendigo Super the HOST performs the independent oversight.</p>
Material service providers	<p>The assessment requirements of service providers is governed by the Group Outsourcing Policy. It must be determined that the service provider can conduct itself in the best financial interests of beneficiaries.</p>

1.3 Conflicts Management

The Board is ultimately responsible for the management of conflicts within Bendigo Super.

Bendigo Super will avoid conflicts where possible following approved governance arrangements embedded in the following policies:

- Group Responsible Persons Policy
- Group Conflicts of Interest Policy and
- Group Outsourcing Policy.

Under each of these respective policies the position cannot be held by a person (or entity) unless Bendigo Super is satisfied that the conflict can be managed and will not create a material risk that the person will fail to perform properly the duties of the position.

Conflicts that can be effectively managed will be managed using the following practices:

- making public disclosures through a product disclosure statements, statutory reporting (annual reports) or publicly available information (website disclosures).
- segregating organisational structures (by duties and by activities).
- actively managing participation in potentially conflicted scenarios (physical or information barriers) and escalating decision making as required.
- Use of independent experts to validate regard to best financial interest duties to beneficiaries.

Bendigo Super's management of conflicts of interest procedures.

Bendigo Super has established procedures to address known potential conflict situations that arise in the course of performing its superannuation operations (refer to *Table 1: Types of activities that may give rise to conflicts of interest*). These procedures are documented in the Bendigo Super's management of conflicts of interest procedures and are approved by the ARC Committee and/or the Board.

The business is required to follow the management procedure set out in this register. The procedures set out the appropriate action to take in the event a conflict arises including the ongoing evaluation of the management of the conflict, any escalation or any alternative action required.

Where no management procedure exists, or a new conflict is identified, Bendigo Super Management must prepare a proposal and recommendation to the ARC Committee as to how the conflict should be managed. The ARC Committee will convene and if it agrees with management's recommendation, the activity is approved. If the ARC Committee disagrees with the recommendation it is escalated to the Board for review and decision. The escalation should detail the committee's concerns and any remedial action or modification taken to address these concerns.

Management provide an annual report to the ARC Committee on the operation of the management procedures and compliance with those procedures.

1.4 Recording and Monitoring

Bendigo Super uses a number of registers to record conflicts of interest (perceived, potential and actual) and procedures to manage these as they arise.

<p>Responsible persons relevant duties and interests register</p> <p>People & Culture Company Secretary</p>	<ul style="list-style-type: none"> • All responsible persons relevant interests and duties are recorded on the Responsible persons relevant duties and interests register. This register is required to be updated on a quarterly basis. • Responsible persons are instructed to promptly report any changes to their interests and duties. • At the commencement of each Board or Board Committee meeting all responsible persons in attendance must declare whether they have any conflicts of interest (in respect of agenda). Details of this confirmation and any action taken are recorded in the minutes of each meeting in accordance with the Board charter and Board committee procedural rules. • All responsible persons are required to satisfy the required standard for fitness and propriety on a continuing basis and will be assessed annually, by People and Culture and/or Company Secretary.
<p>Group Conflicts of Interest Register</p> <p>Executive Member's Assistant</p>	<ul style="list-style-type: none"> • All staff and management are reminded monthly to report personal conflicts of interest (including any applicable gifts offered or received) to the Group Executive Member's Assistant for processing, in accordance with the reporting requirements set out in the Group's Conflict of Interest Policy. • Each Group Executive Member's Assistant processes received conflicts of interest reports to ensure required action is taken and to ensure retention in the Group's Conflict of Interest Register. The Group Executive Member's Assistant is responsible for ensuring this information is current. • People & Culture report to the Group's Executive Member's Assistant personal conflicts of interest identified by Bendigo Super Responsible Persons (excluding non-executive directors and the RSE Auditor).
<p>Bendigo Superannuation Management of Conflicts Procedure</p> <p>Business Unit Head</p>	<ul style="list-style-type: none"> • This document contains the agreed conflict scenarios that apply to Bendigo Super and the management procedures as to how they must be managed. • An annual report is prepared by Management on the operation of the management procedures set out in the Bendigo Super Management of Conflicts Procedure, and compliance with the procedures. This report is provided to the ARC Committee. • The Senior Manager Risk and Compliance is responsible for updating the Bendigo Superannuation Management of Conflicts Procedure.
<p>Group Gift Register</p> <p>Executive Member's Assistant</p>	<ul style="list-style-type: none"> • Bendigo Super designated staff must record in the register the details of all gifts offered (accepted and declined) regardless of the dollar value. Staff must advise their line manager of all gifts or invitations offered (accepted and declined). • Management is reminded monthly to record gifts offered and received in the central Gift Register. The Head of Superannuation and Funds reviews the Gift Register for Bendigo Super at least quarterly.

2 ROLES AND RESPONSIBILITIES

The Board is responsible the management of conflicts throughout the entirety of its business operations. The Board is responsible for setting Bendigo Super's conflict management culture and establishing Bendigo Super's CMF, including methodology and governance.

The following table outlines the roles and responsibilities across Bendigo Super's operations to manage conflicts of interest. Nothing in the below table negates the responsibility of staff to comply with their relevant responsibilities as set out in related Group policies.

Table 5: Roles and responsibilities by lines of defence

Role	Responsibility
Governance	
Bendigo Super Board	<ul style="list-style-type: none"> Develop and maintain the Bendigo Super's conflicts management framework. Take all reasonable steps to ensure that all responsible persons and applicable staff clearly understand: <ul style="list-style-type: none"> the need to identify all potential conflicts; the circumstances that might give rise to a conflict; the content and purpose of the Bendigo Super's CMF; and their obligations, where applicable, as a responsible person of Bendigo Super. Approves conflicts of interest management delegations.
Bendigo Super Audit, Risk and Compliance Committee (ARC Committee)	<ul style="list-style-type: none"> Consider proposals from Management where no management procedure exists, or a new conflict is identified. Recommend to the Board that a conflicted activity be approved where procedures are appropriate to manage the conflict. Escalate to the Board for review and decision any conflicted activity that does not have appropriate management procedures. Consider any changes to existing management procedures established for conflicts noted in the Bendigo Super's management of conflicts of interest procedures Receive an annual report from Management on the operation of the management procedures and compliance with those procedures. Engagement of the RSE Auditor in accordance with the ARC Committee charter requirements, the Group External Audit Independence Policy and the Responsible Persons Policy.
Bendigo Super Investment Governance Committee (Investment Committee)	<ul style="list-style-type: none"> Operate in accordance with the approved Bendigo Super's management of conflicts of interest procedures. Escalate to the ARC Committee and/or Board for review and decision any conflicted activity that does not have appropriate management procedures.

Role	Responsibility
Company Secretary	<ul style="list-style-type: none"> Consider and recommend changes to Bendigo Super's management of conflicts of interest procedures, in respect of investment governance and liquidity risks.
Head of Office of the Superannuation Trustee (HOST)	<ul style="list-style-type: none"> Facilitate the performance and maintain Fit & Proper Assessments for certain Bendigo Super's responsible persons, including Directors and the RSE Auditor(s), in accordance the Group's Responsible Persons Policy. Manage and update the Register of Relevant Personal Duties and Personal Interests of Bendigo Super Responsible Persons quarterly. Manage and update the Bendigo Superannuation Register of Relevant Interests and Duties quarterly. Record conflicts of interest declarations and assist in the management of conflicts of interest at Board and committee meetings. Actions taken to manage or avoid the identified conflict is recorded in the minutes (e.g. voting rights or physical or information barriers). Report to People and Culture new conflicts of interest identified by Bendigo Super Responsible Persons via Board or Board committee declarations.
Line 1 - Conflict management owners	
Head of Superannuation and Funds	<ul style="list-style-type: none"> Ensure the business is operating in a manner that protects the integrity of staff and the integrity of Bendigo Super and the Group in accordance with the requirements of this framework. This includes ensuring all applicable staff receive the appropriate training and supervision to understand the requirements of this framework. Provide an annual report to the ARC Committee on the operation of the management procedures and compliance with those procedures. Disseminate changes to this framework to Bendigo Super Management. Manage and assess any conflicts of interest notified or reported by staff within reporting line. Ensure an up-to-date copy of the Register of Relevant Personal Duties and Personal Interests of Bendigo Super is publicly available on Bendigo Super's website. Delegate responsibility to request monthly updates to the Bendigo Superannuation Gift and Entertainment Register from all Bendigo Super designated staff and to provide register updates to the Group's Executive Member's Assistant, in

Role	Responsibility
	<p>accordance with this Policy and the Group Gift and Entertainment Policy.</p> <ul style="list-style-type: none"> Review the Gift and Entertainment Register for Bendigo Super on a quarterly basis.
Senior Manager Risk & Compliance	<ul style="list-style-type: none"> Assist the Head of Superannuation and Funds by providing support and advice to applicable staff to implement the requirements of this framework and to periodically monitor compliance with the framework. Promote the identification of potential conflict of interests in annual and change Risk & Control Self- Assessments. Monitor and report on non-compliance with the CMF detected through compliance plan surveys, complaints and mandatory training monitoring,
Group Executive Member's Assistant	<ul style="list-style-type: none"> Process conflicts of interest notifications to ensure retention in the Group's Conflict of Interest Register, in accordance with Group's Conflicts of Interest Policy. Maintain a Gift Register for their Executive's division in accordance with Group's Gift and Entertainment Policy.
People and Culture	<ul style="list-style-type: none"> Oversee the development, approval, and application of the Group Responsible Persons Policy. Oversee the appointment of certain responsible personas, including the company secretary, responsible managers and senior managers, in accordance with the Group Responsible Persons Policy. Facilitate the performance and maintain Fit & Proper Assessments for certain Bendigo Super's responsible persons, including the company secretary, responsible managers and senior managers, in accordance the Group's Responsible Persons Policy. Manage and update the responsible persons relevant duties and interests register quarterly.
Bendigo Super Management	<ul style="list-style-type: none"> Follow, and ensure staff within reporting line comply with, the management procedures set out in the Bendigo Super's management of conflicts of interest procedures. Where no management procedure exists, or a new conflict is identified, prepare a proposal and recommendation to the ARC Committee as to how the conflict should be managed. Disseminate changes to this policy to applicable staff within their reporting line. Position descriptions are reviewed to ensure avoidance of conflicts of interest.
Staff	<ul style="list-style-type: none"> Comply with this framework and report any breaches of the framework in accordance with the Bendigo Super risk management framework and the Group operational risk management framework.

Role	Responsibility
	<ul style="list-style-type: none"> Comply with this framework and report all personal conflicts of interest in accordance with the Group's Conflicts of Interest Policy. Comply with this framework and report all gifts offered (accepted and declined), regardless of the dollar value in the Bendigo Super Gift and Entertainment Register.
Line 2 - Oversight and Challenge	
Group Regulatory Compliance	<ul style="list-style-type: none"> Facilitate the annual review and approval of the CMF. Assist applicable staff by providing guidance, support and advice to comply with this framework. Implement mechanisms to oversee and monitor compliance with this framework (including use of compliance plan surveys, regulatory breach management and periodic checks of relevant registers and procedures). Administer the Group Conflict of Interest Register in conjunction with the applicable Executive Member Assistant. Assess reported breaches of this framework in accordance with the Bendigo Super risk management framework and the Group operational risk management framework. Report all significant breaches to the applicable regulator when required.
Group Operational Risk	<ul style="list-style-type: none"> Oversee conflicts of interest risk and risk event management in accordance with the Bendigo Super risk management framework and the Group operational risk management framework.
Line 3 - Independent Assurance	
Group Assurance (Internal audit)	Responsible for conducting a comprehensive review of the conflicts management framework every three years to ensure that the framework remains appropriate, effective and adequate.

3 CULTURE AND TRAINING

Bendigo Super aims to achieve a strong conflicts management culture, as part of its risk and compliance culture, where each staff member owns risk management and compliance, and immediately identifies, reports and addresses any conflicts (perceived or apparent, potential or actual), risks, and risk events (including regulatory and internal breaches). Failure to report is, and will continue to be, treated very seriously.

In addition to the Group training program for conflicts of interest, changes to this Framework are communicated to Bendigo Super Management, who is responsible for disseminating it to applicable staff. This document and the approved Group Conflicts of Interest Policy and Responsible Persons Policy are available to all applicable staff on the assigned shared repository.

Responsible persons are required to be familiar with their area of responsibility and ensure that staff in their area of responsibility are aware of their compliance and reporting obligations.

Bendigo Super Management is reminded monthly to report personal conflicts of interest (including any applicable gifts) to the Group Executive Member's Assistant for processing, in accordance with the reporting requirements set out in the Group's Conflict of Interest Policy. This reinforces the importance of managing conflicts and the need to be aware of any new potential conflicts.

4 REVIEW

4.1 Annual Review

Group Regulatory Compliance coordinates a review of the CMF on an annual basis. The annual review has regard to any feedback received from the ARC Committee, stakeholders or from recommendations raised in the annual report from Management. The results of the review are provided to the Board, and the Board approves the CMF and any changes made to it.

4.2 Comprehensive Review

The HOST ensures that the appropriateness, effectiveness and adequacy of its conflicts management framework is subject to a comprehensive review by Group Assurance at least every three years.

At a minimum, the comprehensive review of the conflicts management framework will consider:

- whether all relevant duties and all relevant interests have been identified and are being addressed in accordance with Bendigo Super's conflicts management framework.
- the level of compliance with conflicts management policies, including reporting on the registers of relevant duties and relevant interests; and
- any non-compliance with conflicts management policies, including steps taken to return to, and improve, ongoing compliance.

5 RELEVANT REGULATION

The CMF sets out the obligations to comply with:

- Corporations Act 2001; AFSL holder general obligations and associated ASIC Regulatory Guides;
- Superannuation Industry (Supervision) Act 1993 and APRA Prudential Standard SPS 521 Conflicts of Interest; and
- General Law.

GOVERNANCE

RESPONSIBILITIES

Role	Responsibility
Managed By	Group Regulatory Compliance
Approved By	Bendigo Super Board

DOCUMENT OWNER

Head of Group Regulatory Compliance

REVIEW

An annual review of the appropriateness, effectiveness and adequacy of the CMF is facilitated by Group Regulatory Compliance. A comprehensive review of the CMF at least every three years is conducted by an independent party to ensure that the conflicts management framework in place are operating effectively and are adequate.

APPROVAL

Responsibility	Party
Reviewed by	Head of Group Regulatory Compliance
Recommended by	Head of Group Regulatory Compliance
Approved by	Bendigo Super Board

RELATED DOCUMENTS

Bendigo Super's CMF is supported by a number of key documents including, and not limited to the documents identified below, which are documents approved by Sandhurst Trustees Limited (STL) as the RSE licensee of the RSE, or Bendigo Super (BSPL) in preparation for its future role as the RSE licensee for the RSE.

Document name	Last Approved
Bendigo Superannuation Board Charter	April 2021 (BSPL)
Bendigo Superannuation Audit, Risk and Compliance Committee Charter	April 2021 (BSPL)
Bendigo Superannuation Board Procedural Rules	April 2021 (BSPL)
Group Responsible Persons Policy	November 2021 (BSPL) - TBC

Document name	Last Approved
Group Remuneration Policy	November 2021 (BSPL) - TBC
Bendigo Super Risk Management Framework	November 2021 (BSPL)
Bendigo Superannuation Investment Governance Framework	November 2021 (BSPL)
Group Whistle-blower Policy	November 2021 (BSPL) - TBC
Group Anti-bribery and Corruption Policy	May 2021 (STL)
Group Code of Conduct	May 2021 (STL)
Group Conflicts of Interest Policy	November 2021 (BSPL) - TBC
Group Gift and Entertainment Policy	November 2021 (BSPL) - TBC
Group Outsourcing Policy	November 2021 (BSPL) - TBC
Group Procurement Policy	18 March 2021 (STL)
Group External Audit Independence Policy	May 2021 (STL)
RSE Licensee Compliance Plan	13 July 2021 (STL)
Bendigo Superannuation Plan Compliance Plan	9 March 2021 (STL)

Each of these documents have been developed to ensure that Bendigo Super has a sound methodology and approach to conflicts management having regard to the size, business mix and complexity of its operations.

In addition to the above, further strategies, policies, procedures and controls deemed necessary to appropriately manage conflicts may be developed if required and will also form part of the CMF.

DOCUMENT CONTROL TABLE

Version No:	Approved By	Date Approved	Date Applicable	Next Review Date	Document Owner
1	Bendigo Superannuation Board	November 2021	Upon BSPL becoming RSE licensee	2022	Head of Group Regulatory Compliance